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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

GODFREY MERE, an individual, ) Case No. 2:23-cv-00487-JCM-DJA

**Plaintiff,**

VS.

STATE OF NEVADA, DEPARTMENT OF  
HEALTH AND HUMAN SERVICES,  
DIVISION OF CHILD AND FAMILY  
SERVICES, Desert Willow Treatment Center  
DOES 1-10 and ROES I-X, inclusive:

## Defendants

Case No. 2:23-cv-00487-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY AND  
DISPOSITIVE MOTION DEADLINES**

## (First Request)

Plaintiff, GODFREY MERE, and Defendant STATE OF NEVADA, DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, DIVISION OF CHILD AND FAMILY SERVICES, DESERT  
WILLOW TREATMENT CENTER, by and through their respective counsel, hereby stipulate to  
and respectfully request that the Court extend the following deadlines set forth in the parties' Discovery  
Plan and Scheduling Order (ECF 20) by ninety (90) days:

Description	Original Deadline (ECF No. 20)	Proposed Deadline
Discovery Cut-off	April 8, 2024	<b>July 7, 2024</b>
Dispositive Motions	May 8, 2024	<b>August 6, 2024</b>

1	Pretrial Order and Disclosures	If no dispositive motions, June 7, 2024; otherwise, 30 days after decision on dispositive motions or further court order.	<b>If no dispositive motions, September 5, 2024; otherwise, 30 days after decision on dispositive motions or further court order.</b>
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6       1. This request is based on:

7           a.       Since the scheduling order was entered on June 26, 2023, the parties have engaged  
8       in dispositive motion practice, an early neutral evaluation session, some written discovery; and  
9       amendment of pleadings.

10          b.       Plaintiff filed his second amended complaint (ECF 33) on February 6, 2024, and  
11      Defendant answered on February 23, 2024, (ECF 35) only 45 days prior to the end of discovery.

12          c.       Previous defense counsel left the office of the attorney general shortly after the  
13      second amended complaint was filed, and the undersigned chief of the Personnel Division, who has had  
14      to assume responsibility for this case while recruiting for a replacement, needs much more time to engage  
15      in and complete discovery.

16       2. This is the first request for an extension of these deadlines and is not made for purposes  
17      of undue delay.

18           APPROVED AS TO FORM AND CONTENT on the 18th day of March, 2024.

19                   AARON D. FORD  
20                   ATTORNEY GENERAL

21           By:     */s/ Cameron Vandenberg* \_\_\_\_\_  
22                   CAMERON P. VANDENBERG  
23                   Chief Deputy Attorney General  
24                   MATTHEW E. ESTRADA  
25                   Deputy Attorney General

26                   *Attorneys for Defendant*

27                   GUINNESS LAW FIRM

28           BY:     */s/ Guiness Ohazuruike* \_\_\_\_\_  
29                   GUINNESS OHAZURUIKE, ESQ.

30                   *Attorney for Plaintiff*

## **ORDER**

IT IS SO ORDERED that the parties' stipulation to extend discovery and dispositive motions deadline (ECF No. 36) is GRANTED.

DATED: 3/19/2024

UNITED STATES MAGISTRATE JUDGE